

## Summary of Representations

15 responses were received, incorporating the views of 48 BSC signatories. In some instances, background and reasoning behind views were not forthcoming. The following table provides a summary of these responses and highlights where explicit arguments were provided.

QUESTION	ELEMENT OF PROPOSAL	RESPONDENT VIEWS	COMMENTS
Q.1/Q.2	OVERALL PROPOSAL	FULLY SUPPORT: 8 responses (for 27 signatories) PARTIALLY SUPPORT: 5 responses (for 17 signatories) AGAINST: 3 responses (for 4 signatories)	Principle arguments in favour were efficiency related. Of those against the proposal, one suggested that it was premature, another suggested that many of the initiatives could be delivered by the existing BSC.
Q.3.1.a)	PANEL OPENNESS	FOR: 15 responses (for 48 signatories) AGAINST: None	
Q.3.1	SPEAKING AT PANEL	FOR: 8 responses (for 30 signatories) AGAINST: 5 responses (for 11 signatories)	One argument in favour suggested that this would allow last minute changes to be discussed. Those against argued that undue influence could be exerted and control of meetings could be more difficult. One response suggested that this could be enabled without a change to the BSC. Another response suggested that this could be allowed only by written pre-agreement and based on response to consultation
Q.3.2	COMMITTEES AS PER PANEL	FOR: 15 responses (for 48 signatories) AGAINST: None	
Q.3.3.a)	STANDING GROUPS	FOR: 14 responses (for 45 signatories) AGAINST: None	One response suggested that the ISG/SVG should be used. One response questioned what the powers of the standing groups would be
Q.3.3.b)	ISSUES DISCUSSED AT GROUPS	FOR: 14 responses (for 40 signatories) AGAINST: 1 response (for 6 signatories)	One argument suggested that this would improve the definition of proposals, once they emerged. A counter-argument was that general consideration of market issues was a regulatory

			matter, not a matter for the BSC governance.
Q.3.3.c)	SELF SELECTION FOR GROUPS	FOR: 9 responses (for 33 signatories) AGAINST: 5 responses (for 12 signatories)	Of those in favour, 2 responses (for 7 signatories) suggested retaining impartiality and 1 response (for two signatories) suggested an obligation to use reasonable endeavours w.r.t. impartiality Arguments against this initiative were that this could prejudice the interests of non-attendees, leaving major payers with the ability to shape the market.
Q.3.3.d)	ELEXON RESPONSIBILITIES	FOR: 14 responses (for 43 signatories) AGAINST: 1 response (for 4 signatories)	The argument against this initiative was that ELEXON's role was to administer the arrangements.
Q.3.4.a)	EVALUATION PROCEDURE	FOR: 11 responses (for 39 signatories) AGAINST: None	One response suggested that the current drafting would allow this approach
Q.3.4.b)	ONE CONSULTATION	FOR: 10 responses (for 38 signatories) AGAINST: 1 response (for one signatory)	One response suggested that current drafting allows for this. Of those in favour, two responses (for ten signatories) felt that increased reporting (such as Mod group minutes) should accompany this change.
Q.3.4.c)	RECOMMEND AFTER CONSULTATION	FOR: 15 responses (for 48 signatories) AGAINST: None	
Q.3.4.d)	RETAIN APPENDIX F.1	FOR: 15 responses (for 48 signatories) AGAINST: None	
Q.3.4.e)	RETAIN URGENT MODS	FOR: 15 responses (for 48 signatories) AGAINST: None	
Q.4	OTHER	The following further changes were proposed: <ul style="list-style-type: none"> <li>Plans for issue review</li> <li>Re-consultation for material changes</li> <li>Obligations on Authority (see comments)</li> <li>Unify Mods process and change control</li> <li>Minimum notice for issue of papers</li> </ul>	Two new obligations on the Authority were suggested: attendance at Standing and Modification Groups and obligation to provide views/rulings on elements of proposals.  Panel involvement was

		<ul style="list-style-type: none"> <li>• Parties to request urgency from ofgem</li> <li>• Full flexibility to amend implementation dates</li> <li>• Ability to separately progress alternatives</li> <li>• Panel involvement (see comments)</li> <li>• Proposer to attend and speak at Panel</li> <li>• Additional alternatives</li> <li>• Payment of expenses (see comments)</li> </ul>	<p>suggested in the following areas: sponsorship of Groups, Panel members to be invited to all Groups and Panel members to chair Groups.</p> <p>One response suggested that expenses should be paid to self-selecting Group members, another suggested not.</p>
Q.5	IMPACT	<p>7 responses suggested no impact.</p> <p>5 responses suggested some notice period</p>	<p>Notice periods suggested were: 1 week (by two responses), 10 days, 14 days, 1 month and 6 months. The response suggesting 6 months suggested no impact if there was no open involvement in meetings.</p>